

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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EQUAL EMPLOYMENT OPPORTUNITY COMMISSION,

Plaintiff,

-against-

BLOOMBERG L.P.,

Defendant.

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JILL PATRICOT, TANYA LANCASTER,
JANET LOURES, and MONICA PRESTIA,

Plaintiff-Intervenors,

-against-

BLOOMBERG L.P.,

Defendant.
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USDC SDNY
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07-CV-8383 (LAP)(HP)

Revised (Revised) Scheduling Order

Pursuant to Rules 16(b) and 26(f) of the Federal Rules of Civil Procedure, the parties in the above-captioned action conferred in person on December 27, 2007 at the New York District Office of the United States Equal Employment Opportunity Commission. Counsel for all of the parties participated in the conference and hereby jointly propose the following schedule for consideration by the Court:

1. The parties shall serve initial disclosures pursuant to Rule 26(a) by
January 17, 2008.

2. Motions relating to any potential protective order in this case shall be filed by February 15, 2008.
3. All parties shall be joined and any amended pleadings shall be served and filed by September 30, 2008. This paragraph shall not apply to the identification and addition of new claimants to the case.
4. New claimants shall be identified and added by October 15, 2008, or 75 days prior to the close of fact discovery.
5. Fact discovery shall be completed by December 31, 2008.
6. Expert reports shall be served by January 30, 2009.
7. Rebuttal expert reports, if any, shall be served by February 27, 2009.
8. Expert depositions shall be completed by March 31, 2009.
9. Counsel for the parties have discussed the general subject matters about which discovery will be sought and the parties have an understanding as to the nature of those subject matters.
10. Counsel for the parties have discussed the production of electronically stored information and have agreed to confer further to determine the form for the production of electronically stored information.
11. The parties shall provide all other parties with a log or logs identifying any materials withheld from production, in whole or in part, on the grounds of any privilege.

12. Any dispositive motions shall be served and filed by May 31, 2009.
13. The parties shall jointly file a pretrial order within fourteen (14) days of a decision on any dispositive motion, if necessary. If no dispositive motions are filed, the parties shall jointly file a pretrial order by July 10, 2009.
14. The parties agree that the service of discovery materials, motion papers, correspondence and all other papers may be made by electronic mail.
15. The parties jointly request relief from the limitation on the number of depositions provided for in Rule 30 and seek the Court's permission to take more than 10 depositions per side.

Respectfully submitted,

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SO ORDERED:

Loretta A. Preska
Loretta A. Preska, U.S.D.J.

June 29, 2008